



DANIEL G. BOGDEN  
United States Attorney  
BRADLEY W. GILES  
Assistant United States Attorney  
333 Las Vegas Blvd., South, Suite 5000  
Las Vegas, Nevada 89101  
(702) 388-6050

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

JACOB LILL,  
EDMUND SCHROBACK,  
CHRISTOPHER GREEN,  
KYLE LAIR,  
RICHARD WHEATON,  
MICHAEL SAVINO, and  
ANA MARTINEZ,

DEFENDANTS.

CRIMINAL INDICTMENT

2:11-cr- 310

VIOLATIONS:

21 U.S.C. § 846 - Conspiracy to  
Distribute Marijuana and Hashish Oil

21 U.S.C. § 856(a) - Maintaining a  
Drug-Involved Premises

21 U.S.C. §§ 841 (a)(1) and 860(a) -  
Distribution of a Controlled Substance  
within 1000 feet of a Playground

21 U.S.C. § 841 (a)(1) - Possession  
With Intent to Manufacture a Controlled  
Substance

21 U.S.C. § 841 - Distribution of  
Marijuana / Possession of Marijuana  
and Hashish Oil with Intent to Distribute

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

Conspiracy to Distribute Marijuana

From a time unknown, and continuing up to and including August 3, 2011, in the  
State and Federal District of Nevada,

1 JACOB LILL,  
2 EDMUND SCHROBACK,  
3 CHRISTOPHER GREEN,  
4 KYLE LAIR,  
5 RICHARD WHEATON,  
6 MICHAEL SAVINO, and  
7 ANA MARTINEZ

8 defendants herein, did knowingly and intentionally combine, conspire, confederate and  
9 agree with each other and others known and unknown to possess with the intent to  
10 distribute less than 50 kilograms of marijuana, a Schedule I controlled substance, in  
11 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

12 All in violation of Title 21, United States Code, Section 846.

13 **COUNT TWO**  
14 Conspiracy to Distribute Hash Oil

15 From a time unknown, and continuing up to and including August 3, 2011, in the  
16 State and Federal District of Nevada,

17 JACOB LILL,  
18 EDMUND SCHROBACK,  
19 CHRISTOPHER GREEN,  
20 KYLE LAIR,  
21 RICHARD WHEATON,  
22 MICHAEL SAVINO, and  
23 ANA MARTINEZ

24 defendants herein, did knowingly and intentionally combine, conspire, confederate and  
25 agree with each other and others known and unknown to possess with the intent to  
26 distribute one kilogram and more of Hashish Oil, a Schedule I controlled substance, in  
violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

**COUNT THREE**  
Maintaining a Drug-Involved Premises

From a time unknown but not later than March 3, 2011, up to and including April  
13, 2011, in the State and Federal District of Nevada,

**JACOB LILL, and  
EDMUND SCHROBACK,**

defendants herein, knowingly and intentionally opened and maintained a place identified as: Completely Legal, located at 3655 S. Durango Suite #19, Las Vegas, Nevada, 89147, for the purpose of distributing marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT FOUR**  
**Maintaining a Drug-Involved Premises**

From a time unknown but not later than March 3, 2011, up to and including August 3, 2011, in the State and Federal District of Nevada,

**JACOB LILL, and  
EDMUND SCHROBACK,**

defendants herein, knowingly and intentionally opened and maintained a place identified as: Completely Legal 2.0, located at 6401 N. Durango Avenue, Suite #120, Las Vegas, Nevada, 89149, for the purpose of distributing marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT FIVE**  
**Maintaining a Drug-Involved Premises**

From a time unknown but not later than March 3, 2011, up to and including August 3, 2011, in the State and Federal District of Nevada,

**JACOB LILL, and  
EDMUND SCHROBACK,**

defendants herein, knowingly and intentionally opened and maintained a place identified as: Completely Legal 3.0, located at 3650 S. Eastern Avenue, Suite #100, Las Vegas, Nevada, 89169, for the purpose of distributing marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT SIX**

Distribution of a Controlled Substance Within 1000 Feet of a Playground

On or about March 3, 2011, in the State and Federal District of Nevada,

**JACOB LILL,  
EDMUND SCHROBACK,  
CHRISTOPHER GREEN, and  
KYLE LAIR,**

defendants herein, did knowingly and intentionally distribute, and possess with the intent to distribute, marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising a playground, to wit: a public playground located at Desert Breeze Park, 8425 Spring Mountain Rd., Las Vegas, Nevada, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

**COUNT SEVEN**

Distribution of a Controlled Substance Within 1000 Feet of a Playground

On or about March 15, 2011, in the State and Federal District of Nevada,

**JACOB LILL,  
EDMUND SCHROBACK, and  
CHRISTOPHER GREEN,**

defendants herein, did knowingly and intentionally distribute, and possess with the intent to distribute, marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising a playground, to wit: a public playground located at Desert Breeze Park, 8425 Spring Mountain Rd., Las Vegas, Nevada, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

**COUNT EIGHT**

Possession with Intent to Manufacture a Controlled Substance

On or about April 13, 2011, in the State and Federal District of Nevada,

**JACOB LILL;  
EDMUND SCHROBACK,  
ANA MARTINEZ, and  
MICHAEL SAVINO,**

1 defendants herein, knowingly and intentionally possessed with the intent to manufacture,  
2 distribute and dispense approximately 200 marijuana plants, a Schedule I controlled  
3 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
4 (b)(1)(B)(vii).

5 **COUNT NINE**

6 **Possession with Intent to Manufacture a Controlled Substance**

7 From a time unknown to on or about August 4, 2011, in the State and Federal  
8 District of Nevada,

9 **JACOB LILL, and**  
10 **EDMUND SCHROBACK,**

11 defendants herein, knowingly and intentionally possessed with the intent to manufacture,  
12 distribute and dispense approximately 222 marijuana plants, a Schedule I controlled  
13 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
14 (b)(1)(B)(vii).

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**FORFEITURE ALLEGATION ONE**

Conspiracy to Distribute Marijuana and Conspiracy to Distribute Hash Oil

1. The allegations of Counts One and Two of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a)(1).

2. Upon convictions of the felony offenses charged in Counts One and Two of this Criminal Indictment,

**JACOB LILL,  
EDMUND SCHROBACK,  
CHRISTOPHER GREEN,  
KYLE LAIR,  
RICHARD WHEATON,  
MICHAEL SAVINO, and  
ANA MARTINEZ,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violations of Title 21, United States Code, Sections 841(a)(1), (b)(1)(c), (b)(1)(D), and 846:

- a. \$81,475.00 in United States Currency (seized from 24/7 Private Vaults, based on keys recovered from Jacob Lill on or about 4/13/11);
- b. \$4,105.00 in United States Currency (seized from Edmund J. Schroback representing the day's drug sales of marijuana by Completely Legal 1.0 on or about 4/13/2011);
- c. \$2,962.00 in United States Currency (seized from the cash register at Completely Legal 2.0 on or about 4/13/2011);

- d. \$2,585.00 in United States Currency (seized from the cash drawer at Completely Legal 2.0 on or about 8/3/2011);
- e. \$1,314.00 in United States Currency (seized from master bedroom of Jacob Lill's home on or about 8/3/2011);
- f. \$12,056.00 in United States Currency (seized from bag in Jacob Lill's vehicle at his home on or about 8/3/2011);
- g. \$2,567.00 in United States Currency (seized from cash drawer at Completely Legal 3.0 on or about 8/3/2011);
- h. \$7,432.00 in United States Currency (seized from Jacob Lill's residence on or about 4/13/2011);
- i. \$2,150.00 in United States Currency (seized from Bank of America Account No. 501012187203 in the name of PMW, Inc., seized on or about 8/5/2011);
- j. \$2,665.00 in United States Currency (seized from Bank of America Account No. 501012645570 in the name of EOS Ventures, LLC seized on or about 8/5/2011); and
- k. 2007 Mercedes CLK350, VIN: WDBTJ56H57F215349, including approximately \$18,000 in upgrades, including

1 a custom audio system (seized on or about  
2 4/13/11).

3 All pursuant to Title 21, United States Code, Sections 841(a)(1), (b)(1)(C),  
4 (b)(1)(D), 846, and 853(a)(1).

5 **FORFEITURE ALLEGATION TWO**

6 Conspiracy to Distribute Marijuana and Conspiracy to Distribute Hash Oil

7 1. The allegations of Counts One and Two of this Criminal Indictment are  
8 hereby realleged and incorporated herein by reference for the purpose of alleging  
9 forfeiture pursuant to Title 21, United States Code, Section 853(a)(2).

10 2. Upon convictions of the felony offenses charged in Counts One and Two  
11 of this Criminal Indictment,

12 JACOB LILL,  
13 EDMUND SCHROBACK,  
14 CHRISTOPHER GREEN,  
15 KYLE LAIR,  
16 RICHARD WHEATON,  
17 MICHAEL SAVINO, and  
18 ANA MARTINEZ

19 defendants herein, shall forfeit to the United States of America, any property used, or  
20 intended to be used, in any manner or part, to commit, or to facilitate the commission of  
21 violations of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), (b)(1)(D), and  
22 846:

- 23 a. 2,150.00 in United States Currency (seized  
24 from Bank of America Account No.  
25 501012187203 in the name of PMW, Inc.);  
26 b. \$2,665.00 in United States Currency (seized  
from Bank of America Account No.  
501012645570 in the name of EOS Ventures,  
LLC); and



- 1           c.    2007 Mercedes CLK350, VIN:  
2               WDBTJ56H57F215349, including  
3               approximately \$18,000 in upgrades, including  
4               a custom audio system.

5           All pursuant to Title 21, United States Code Sections 841(a)(1), (b)(1)(C), (b)(1)(D),  
6   846, and 853(a)(2).

7                           **FORFEITURE ALLEGATION THREE**  
8                           **Maintaining a Drug-Involved Premises**

9           1.    The allegations of Counts Three, Four and Five of this Criminal Indictment  
10           are hereby realleged and incorporated herein by reference for the purpose of alleging  
11           forfeiture pursuant to Title 21, United States Code, Section 853(a)(1).

12           2.    Upon convictions of the felony offenses charged in Counts Three, Four and  
13           Five of this Criminal Indictment,

14                           **JACOB LILL and**  
15                           **EDMUND SCHROBACK,**

16           defendants herein, shall forfeit to the United States of America, any property constituting,  
17           or derived from, any proceeds obtained, directly or indirectly, as the result of violations  
18           of Title 21, United States Code, Section 856(a)(1):

- 19           a.    \$81,475.00 in United States Currency (seized  
20               from 24/7 Private Vaults, based on keys  
21               recovered from Jacob Lill on or about 4/13/11);  
22           b.    \$4,105.00 in United States Currency (seized  
23               from Edmund J. Schroback representing the  
24               day's drug sales of marijuana by Completely  
25               Legal 1.0 on or about 4/13/2011);  
26               .

- c. \$2,962.00 in United States Currency (seized from the cash register at Completely Legal 2.0 on or about 4/13/2011);
- d. \$2,585.00 in United States Currency (seized from the cash drawer at Completely Legal 2.0 on or about 8/3/2011);
- e. \$1,314.00 in United States Currency (seized from master bedroom of Jacob Lill's home on or about 8/3/2011);
- f. \$12,056.00 in United States Currency (seized from bag in Jacob Lill's vehicle at his home on or about 8/3/2011);
- g. \$2,567.00 in United States Currency (seized from cash drawer at Completely Legal 3.0 on or about 8/3/2011);
- h. \$7,432.00 in United States Currency (seized from Jacob Lill's residence on or about 4/13/2011);
- i. \$2,150.00 in United States Currency (seized from Bank of America Account No. 501012187203 in the name of PMW, Inc., seized on or about 8/5/2011);
- j. \$2,665.00 in United States Currency (seized from Bank of America Account No. 501012645570 in the name of EOS Ventures, LLC seized on or about 8/5/2011); and

1 k. 2007 Mercedes CLK350, VIN:  
2 WDBTJ56H57F215349, including  
3 approximately \$18,000 in upgrades, including  
4 a custom audio system (seized on or about  
5 4/13/11).

6 All pursuant to Title 21, United States Code, Sections 856(a)(1) and 853(a)(1).

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8 **FORFEITURE ALLEGATION FOUR**  
9 **Maintaining a Drug-Involved Premises**

10 1. The allegations of Counts Three, Four and Five of this Criminal Indictment  
11 are hereby realleged and incorporated herein by reference for the purpose of alleging  
12 forfeiture pursuant to Title 21, United States Code, Section 853(a)(2).

13 2. Upon convictions of the felony offenses charged in Counts Three, Four and  
14 Five of this Criminal Indictment,

15 **JACOB LILL and**  
16 **EDMUND SCHROBACK,**

17 defendants herein, shall forfeit to the United States of America, any property used, or  
18 intended to be used, in any manner or part, to commit, or to facilitate the commission of  
19 violations of Title 21, United States Code, Section 856(a)(1):

- 20 a. \$2,150.00 in United States Currency (seized  
21 from Bank of America Account No.  
22 501012187203 in the name of PMW, Inc.);  
23 b. \$2,665.00 in United States Currency (seized  
24 from Bank of America Account No.  
25 501012645570 in the name of EOS Ventures,  
26 LLC); and

1 c. 2007 Mercedes CLK350, VIN:  
2 WDBTJ56H57F215349, including  
3 approximately \$18,000 in upgrades, including  
4 a custom audio system. All pursuant to Title 21,  
5 United States Code Sections 856(a)(1) and  
6 853(a)(2).

7 All pursuant to Title 21, United States Code Sections 856(a)(1) and 853(a)(2).

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9 **FORFEITURE ALLEGATION FIVE**

10 Distribution of a Controlled Substance Within 1000 Feet of a Playground

11 1. The allegations of Count Six of this Criminal Indictment are hereby realleged  
12 and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
13 Title 21, United States Code, Section 853(a)(1).

14 2. Upon convictions of the felony offenses charged in Count Six of this  
15 Criminal Indictment,

16 **JACOB LILL,**  
17 **EDMUND SCHROBACK,**  
18 **CHRISTOPHER GREEN, and**  
**KYLE LAIR,**

19 defendants herein, shall forfeit to the United States of America, any property constituting,  
20 or derived from, any proceeds obtained, directly or indirectly, as the result of violations of  
21 Title 21, United States Code, Sections 841(a)(1) and 860(a):

- 22 a. \$81,475.00 in United States Currency (seized  
23 from 24/7 Private Vaults, based on keys  
24 recovered from Jacob Lill on or about 4/13/11);  
25 b. \$4,105.00 in United States Currency (seized  
26 from Edmund J. Schroback representing the

1 day's drug sales of marijuana by Completely  
2 Legal 1.0 on or about 4/13/2011);

3 c. \$2,962.00 in United States Currency (seized  
4 from the cash register at Completely Legal 2.0  
5 on or about 4/13/2011);

6 d. \$2,585.00 in United States Currency (seized  
7 from the cash drawer at Completely Legal 2.0  
8 on or about 8/3/2011);

9 e. \$1,314.00 in United States Currency (seized  
10 from master bedroom of Jacob Lill's home on  
11 or about 8/3/2011);

12 f. \$12,056.00 in United States Currency (seized  
13 from bag in Jacob Lill's vehicle at his home on  
14 or about 8/3/2011);

15 g. \$2,567.00 in United States Currency (seized  
16 from cash drawer at Completely Legal 3.0 on  
17 or about 8/3/2011);

18 h. \$7,432.00 in United States Currency (seized  
19 from Jacob Lill's residence on or about  
20 4/13/2011);

21 i. \$2,150.00 in United States Currency (seized  
22 from Bank of America Account No.  
23 501012187203 in the name of PMW, Inc.,  
24 seized on or about 8/5/2011);

25 j. \$2,665.00 in United States Currency (seized  
26 from Bank of America Account No.

501012645570 in the name of EOS Ventures,  
LLC seized on or about 8/5/2011); and

k. 2007 Mercedes CLK350, VIN:  
WDBTJ56H57F215349, including  
approximately \$18,000 in upgrades, including  
a custom audio system (seized on or about  
4/13/11).

All pursuant to Title 21, United States Code, Sections 841(a)(1),  
860(a) and 853(a)(1).

**FORFEITURE ALLEGATION SIX**

**Distribution of a Controlled Substance Within 1000 Feet of a Playground**

1. The allegations of Count Six of this Criminal Indictment are hereby realleged  
and incorporated herein by reference for the purpose of alleging forfeiture pursuant to  
Title 21, United States Code, Section 853(a)(2).

2. Upon convictions of the felony offenses charged in Count Six of this  
Criminal Indictment,

**JACOB LILL,  
EDMUND SCHROBACK,  
CHRISTOPHER GREEN, and  
KYLE LAIR,**

defendants herein, shall forfeit to the United States of America, any property used, or  
intended to be used, in any manner or part, to commit, or to facilitate the commission of  
violations of Title 21, United States Code, Sections 841(a)(1) and 860(a):

a. \$2,150.00 in United States Currency (seized  
from Bank of America Account No.  
501012187203 in the name of PMW, Inc.);

- b. \$2,665.00 in United States Currency (seized from Bank of America Account No. 501012645570 in the name of EOS Ventures, LLC); and
- c. 2007 Mercedes CLK350, VIN: WDBTJ56H57F215349, including approximately \$18,000 in upgrades, including a custom audio system.

All pursuant to Title 21, United States Code Sections 841(a)(1), 860(a) and 853(a)(2).

**FORFEITURE ALLEGATION SEVEN**

**Distribution of a Controlled Substance Within 1000 Feet of a Playground**

1. The allegations of Count Seven of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a)(1).

2. Upon convictions of the felony offenses charged in Count Seven of this Criminal Indictment,

**JACOB LILL,  
EDMUND SCHROBACK, and  
CHRISTOPHER GREEN,**

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violations of Title 21, United States Code, Sections 841(a)(1) and 860(a):

- a. \$81,475.00 in United States Currency (seized from 24/7 Private Vaults, based on keys recovered from Jacob Lill on or about 4/13/11);
- b. \$4,105.00 in United States Currency (seized from Edmund J. Schroback representing the

1 day's drug sales of marijuana by Completely  
2 Legal 1.0 on or about 4/13/2011);

3 c. \$2,962.00 in United States Currency (seized  
4 from the cash register at Completely Legal 2.0  
5 on or about 4/13/2011);

6 d. \$2,585.00 in United States Currency (seized  
7 from the cash drawer at Completely Legal 2.0  
8 on or about 8/3/2011);

9 e. \$1,314.00 in United States Currency (seized  
10 from master bedroom of Jacob Lill's home on  
11 or about 8/3/2011);

12 f. \$12,056.00 in United States Currency (seized  
13 from bag in Jacob Lill's vehicle at his home on  
14 or about 8/3/2011);

15 g. \$2,567.00 in United States Currency (seized  
16 from cash drawer at Completely Legal 3.0 on  
17 or about 8/3/2011);

18 h. \$7,432.00 in United States Currency (seized  
19 from Jacob Lill's residence on or about  
20 4/13/2011);

21 i. \$2,150.00 in United States Currency (seized  
22 from Bank of America Account No.  
23 501012187203 in the name of PMW, Inc.,  
24 seized on or about 8/5/2011);

25 j. \$2,665.00 in United States Currency (seized  
26 from Bank of America Account No.



501012645570 in the name of EOS Ventures,  
LLC seized on or about 8/5/2011); and

k. 2007 Mercedes CLK350, VIN:  
WDBTJ56H57F215349, including  
approximately \$18,000 in upgrades, including  
a custom audio system (seized on or about  
4/13/11).

All pursuant to Title 21, United States Code, Sections 841(a)(1), 860(a) and  
853(a)(1).

**FORFEITURE ALLEGATION EIGHT**

**Distribution of a Controlled Substance Within 1000 Feet of a Playground**

1. The allegations of Count Seven of this Criminal Indictment are hereby  
realleged and incorporated herein by reference for the purpose of alleging forfeiture  
pursuant to Title 21, United States Code, Section 853(a)(2).

2. Upon convictions of the felony offenses charged in Count Seven of this  
Criminal Indictment,

**JACOB LILL,  
EDMUND SCHROBACK, and  
CHRISTOPHER GREEN,**

defendants herein, shall forfeit to the United States of America, any property used, or  
intended to be used, in any manner or part, to commit, or to facilitate the commission of  
violations of Title 21, United States Code, Sections 841(a)(1) and 860(a):

- a. \$2,150.00 in United States Currency (seized  
from Bank of America Account No.  
501012187203 in the name of PMW, Inc.);
- b. \$2,665.00 in United States Currency (seized  
from Bank of America Account No.

501012645570 in the name of EOS Ventures,  
LLC); and

- c. 2007 Mercedes CLK350, VIN:  
WDBTJ56H57F215349, including  
approximately \$18,000 in upgrades, including  
a custom audio system.

All pursuant to Title 21, United States Code Sections 841(a)(1), 860(a) and  
853(a)(2).

**FORFEITURE ALLEGATION NINE**

**Possession with Intent to Manufacture a Controlled Substance**

1. The allegations of Count Eight of this Criminal Indictment are hereby  
realleged and incorporated herein by reference for the purpose of alleging forfeiture  
pursuant to Title 21, United States Code, Section 853(a)(1).

2. Upon convictions of the felony offenses charged in Count Eight of this  
Criminal Indictment,

**JACOB LILL,  
EDMUND SCHROBACK,  
MICHAEL SAVINO, and  
ANA MARTINEZ,**

defendants herein, shall forfeit to the United States of America, any property constituting,  
or derived from, any proceeds obtained, directly or indirectly, as the result of violations of  
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii):

- a. \$81,475.00 in United States Currency (seized  
from 24/7 Private Vaults, based on keys  
recovered from Jacob Lill on or about 4/13/11);  
b. \$4,105.00 in United States Currency (seized  
from Edmund J. Schroback representing the

1 day's drug sales of marijuana by Completely  
2 Legal 1.0 on or about 4/13/2011);

3 c. \$2,962.00 in United States Currency (seized  
4 from the cash register at Completely Legal 2.0  
5 on or about 4/13/2011);

6 d. \$2,585.00 in United States Currency (seized  
7 from the cash drawer at Completely Legal 2.0  
8 on or about 8/3/2011);

9 e. \$1,314.00 in United States Currency (seized  
10 from master bedroom of Jacob Lill's home on  
11 or about 8/3/2011);

12 f. \$12,056.00 in United States Currency (seized  
13 from bag in Jacob Lill's vehicle at his home on  
14 or about 8/3/2011);

15 g. \$2,567.00 in United States Currency (seized  
16 from cash drawer at Completely Legal 3.0 on  
17 or about 8/3/2011);

18 h. \$7,432.00 in United States Currency (seized  
19 from Jacob Lill's residence on or about  
20 4/13/2011);

21 i. \$2,150.00 in United States Currency (seized  
22 from Bank of America Account No.  
23 501012187203 in the name of PMW, Inc.,  
24 seized on or about 8/5/2011);

25 j. \$2,665.00 in United States Currency (seized  
26 from Bank of America Account No.

501012645570 in the name of EOS Ventures,  
LLC seized on or about 8/5/2011); and

k. 2007 Mercedes CLK350, VIN:  
WDBTJ56H57F215349, including  
approximately \$18,000 in upgrades, including  
a custom audio system (seized on or about  
4/13/11).

All pursuant to Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii),  
and 853(a)(1).

**FORFEITURE ALLEGATION TEN**

**Possession with Intent to Manufacture a Controlled Substance**

1. The allegations of Count Eight of this Criminal Indictment are hereby  
realleged and incorporated herein by reference for the purpose of alleging forfeiture  
pursuant to Title 21, United States Code, Section 853(a)(2).

2. Upon convictions of the felony offenses charged in Count Eight of this  
Criminal Indictment,

**JACOB LILL,  
EDMUND SCHROBACK,  
MICHAEL SAVINO, and  
ANA MARTINEZ,**

defendants herein, shall forfeit to the United States of America, any property used, or  
intended to be used, in any manner or part, to commit, or to facilitate the commission of  
violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii):

a. \$2,150.00 in United States Currency (seized  
from Bank of America Account No.  
501012187203 in the name of PMW, Inc.);

- 1           b.     \$2,665.00 in United States Currency (seized  
2                     from Bank of America Account No.  
3                     501012645570 in the name of EOS Ventures,  
4                     LLC); and  
5           c.     2007 Mercedes CLK350, VIN:  
6                     WDBTJ56H57F215349, including  
7                     approximately \$18,000 in upgrades, including  
8                     a custom audio system.

9           All pursuant to Title 21, United States Code Sections 841(a)(1), 841(b)(1)(B)(vii),  
10          and 853(a)(2).

11                           **FORFEITURE ALLEGATION ELEVEN**

12                           Possession with Intent to Manufacture a Controlled Substance

13           1.     The allegations of Count Nine of this Criminal Indictment are hereby  
14          realleged and incorporated herein by reference for the purpose of alleging forfeiture  
15          pursuant to Title 21, United States Code, Section 853(a)(1).

16          2.     Upon convictions of the felony offenses charged in Count Nine of this Criminal  
17          Indictment,

18                           **JACOB LILL, and  
                          EDMUND SCHROBACK,**

19          defendants herein, shall forfeit to the United States of America, any property constituting,  
20          or derived from, any proceeds obtained, directly or indirectly, as the result of violations of  
21          Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii):

- 22           a.     \$81,475.00 in United States Currency (seized  
23                     from 24/7 Private Vaults, based on keys  
24                     recovered from Jacob Lill on or about 4/13/11);  
25           b.     \$4,105.00 in United States Currency (seized  
26                     from Edmund J. Schroback representing the

1 day's drug sales of marijuana by Completely  
2 Legal 1.0 on or about 4/13/2011);

3 c. \$2,962.00 in United States Currency (seized  
4 from the cash register at Completely Legal 2.0  
5 on or about 4/13/2011);

6 d. \$2,585.00 in United States Currency (seized  
7 from the cash drawer at Completely Legal 2.0  
8 on or about 8/3/2011);

9 e. \$1,314.00 in United States Currency (seized  
10 from master bedroom of Jacob Lill's home on  
11 or about 8/3/2011);

12 f. \$12,056.00 in United States Currency (seized  
13 from bag in Jacob Lill's vehicle at his home on  
14 or about 8/3/2011);

15 g. \$2,567.00 in United States Currency (seized  
16 from cash drawer at Completely Legal 3.0 on  
17 or about 8/3/2011);

18 h. \$7,432.00 in United States Currency (seized  
19 from Jacob Lill's residence on or about  
20 4/13/2011);

21 i. \$2,150.00 in United States Currency (seized  
22 from Bank of America Account No.  
23 501012187203 in the name of PMW, Inc.,  
24 seized on or about 8/5/2011);

25 j. \$2,665.00 in United States Currency (seized  
26 from Bank of America Account No.

501012645570 in the name of EOS Ventures,  
LLC seized on or about 8/5/2011); and

- k. 2007 Mercedes CLK350, VIN:  
WDBTJ56H57F215349, including  
approximately \$18,000 in upgrades, including  
a custom audio system (seized on or about  
4/13/11).

All pursuant to Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii),  
and 853(a)(1).

**FORFEITURE ALLEGATION TWELVE**

**Possession with Intent to Manufacture a Controlled Substance**

1. The allegations of Count Nine of this Criminal Indictment are hereby  
realleged and incorporated herein by reference for the purpose of alleging forfeiture  
pursuant to Title 21, United States Code, Section 853(a)(2).

2. Upon convictions of the felony offenses charged in Count Nine of this  
Criminal Indictment,

**JACOB LILL, and  
EDMUND SCHROBACK,**

defendants herein, shall forfeit to the United States of America, any property used, or  
intended to be used, in any manner or part, to commit, or to facilitate the commission of  
violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii):

- a. \$2,150.00 in United States Currency (seized  
from Bank of America Account No.  
501012187203 in the name of PMW, Inc.);  
b. \$2,665.00 in United States Currency (seized  
from Bank of America Account No.

501012645570 in the name of EOS Ventures,  
LLC); and

c. 2007 Mercedes CLK350, VIN:  
WDBTJ56H57F215349, including  
approximately \$18,000 in upgrades, including  
a custom audio system.

All pursuant to Title 21, United States Code Sections 841(a)(1), 841(b)(1)(B)(vii),  
and 853(a)(2).

**DATED:** this 23<sup>rd</sup> day of August, 2011.

**A TRUE BILL:**

/s/  
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN  
United States Attorney

BRADLEY W. GILES  
Assistant United States Attorney